

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. No. 1722

**CERTIFICATION OF COUNSEL OF REVISED ORDER REGARDING THRASIO,  
LLC'S MOTION FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE  
EXPENSE CLAIM**

I, Michael J. Joyce, counsel for Thrasio, LLC (“Movant”), hereby certify as follows:

1. On January 15, 2025, Movant filed *Thrasio, LLC's Motion for Allowance and Payment of Administrative Expense Claim* [D.I. No. 1722] (the “Motion”).
2. Counsel for Movant and counsel for the above-captioned debtors have reached agreement on a revised proposed form of order (the “Proposed Order”) resolving the Motion. A true and correct copy of the Proposed Order is attached hereto as Exhibit “A”. A blackline version of the Proposed Order detailing changes from the original order is attached hereto as Exhibit “B”.

[Signature Page to Follow]

<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases (hereafter, “Debtors”) are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broihill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277).

**WHEREFORE**, it is hereby respectfully requested that the Court enter the Proposed Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: September 17, 2025

**JOYCE, LLC**

/s/ Michael J. Joyce

Michael J. Joyce (No. 4563)  
1225 King Street, Suite 800  
Wilmington, Delaware 19801  
Telephone: (302) 388-1944  
Email: [mjoyce@mjlawoffices.com](mailto:mjoyce@mjlawoffices.com)

*Counsel to Thrasio, LLC*